



1600 Wilson Boulevard, Suite 700
Arlington, VA 22209
703.243.9423
www.consovoymccarthy.com

July 2, 2025

By ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *Andav Capital et al. v. PayPal Holdings, Inc., et al.*, No. 25 Civ. 00033 (JMF)

Dear Judge Furman:

Plaintiffs Andav Capital and Nisha Desai respectfully request a seven-day extension of time to file their opposition brief to Defendants' motion to dismiss. Currently, Plaintiffs' opposition is due on July 11. *See* Doc.43. If the Court grants Plaintiffs' extension motion, they will file their opposition on July 18. Plaintiffs have previously requested one extension. Defendants consent to Plaintiffs' current request.

Good cause exists for a seven-day extension. The attorneys responsible for Plaintiffs' opposition have had several competing obligations emerge since the last extension. Cameron Norris, for example, has had time-sensitive discovery disputes in two matters, dispositive motions practice in another matter, and intensive settlement negotiations in three matters. Andav's other lead attorney, Patrick Strawbridge, must present oral argument in *Alex Titcomb v. Maine Sec'y of State*, No. 25-284 (Me. Sup. Jud. Ct.) on July 8. There are no upcoming appearances or other deadlines in this case.

Respectfully submitted,

/s/ Daniel M. Vitagliano

Counsel for Plaintiffs

dvitagliano@consovoymccarthy.com

Application GRANTED. Defendants' reply, if any, shall be filed by **July 25, 2025**. The Clerk of Court is directed to terminate ECF No. 44.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', is written over the text 'SO ORDERED.'.

July 2, 2025